

U.S. DISTRICT COURT

UNITED STATES OF AMERICA

JOHNATHON S. IRISH

V

UNITED STATES OF AMERICA

1:16-CV-70-PB

U.S. DISTRICT COURT
DISTRICT OF NH
FILED
CONCORD N.H.
2016 JUL -8 A 11: 53

PLAINTIFFS OBJECTION TO GOVERNMENTS UNTIMELY NOTICE/REQUEST FOR CONTINUANCE

Now comes Johnathon Irish, Pro Se with an **OBJECTION TO THE GOVERNMENTS UNTIMELEY NOTICE/REQUEST FOR CONTINUANCE** and says that:

On 8 July, 2016 Mr. Irish received an email from Vincent Negron, Deputy Clerk and case manager for the above mentioned case, **JOHNATHON S. IRISH V UNITED STATES OF AMERICA**, this email was to notify Mr. Irish that the United States Attorney's Office had made contact with the Clerk's office and notified them that Larry Vogelmann, one of their "central witnesses" would not be available to testify on 13 July, 2016 and that the hearing must be rescheduled due to a "medical procedure".

1. Absolutely NO motion was filed in this matter requesting a continuance simply a verbal notice to the Clerk, Mr. Irish was NOT contacted by the US Attorney's Office and asked if he would assent or object and neither was Attorney Brandon Ross, Mr. Irish's former counsel violating Local Rule 7.1.

2. This notice of Mr. Vogelmann's inability to appear came no more than three days AFTER Mr. Irish filed a Pro-Se appearance specifically outlining and explaining that Mr. Irish's witnesses would not be available for quite a lengthy period of time after the

fourth week of July 2016 in which Mr. Irish SPECIFICILY requested NO MORE CONTINUANCES.

3. This notice and request for continuance by the US Attorney's Office comes less than one week until the scheduled hearing date of 13 July, 2016, specifically THREE BUSINESS DAYS prior.

4. This hearing of 13 July, 2016 has been scheduled since 02 June, 2016. This has been MORE than ample time for the United States Attorney's to notify Mr. Vogelmann and clear up any schedule conflicts, instead the United States Attorney's Office chose to wait until last minute to notify the court of the scheduling conflict forcing a continuance only THREE DAYS after being specifically notified by Mr. Irish through his Notice of Pro-Se Representation that Mr. Irish's witnesses would be unavailable for quite a large amount of time after the end of July 2016 which is why Mr. Irish SPECIFICALLY requested that this court NOT continue this matter due to his Pro-Se Representation.

5. This is clearly either a stall tactic on behalf of the US Attorney's OR clearly shows their negligence of not being able to properly notify their witnesses and resolve any scheduling conflicts in a TIMELY MANNER.

Mr. Irish respectfully requests that this court:

1. Does NOT grant a continuance due to the United States Attorney's
UNTIMELY NOTICE whereas The United States Attorney's Offices has had

ample time since 02 June, 2016 to notify Mr. Vogelmann as well as resolve any scheduling conflicts,

2. That this notification is in violation of Local Rule 7.1 as well as,
3. That it is clear that the United States Attorney's Office had prior knowledge that Mr. Irish's witnesses would not be available after the scheduled date of 13 July, 2016 and,
4. The United States Attorney's Office gave notice of Mr. Vogelmann's inability to appear conveniently THREE DAYS AFTER being PROPERLY notified by Mr. Irish that HIS witnesses would NOT be available after the end of July 2016 through Mr. Irish's Pro-Se.

Respectfully Submitted,



Jonathon S. Irish

Pro-Se

8 July, 2016

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on Seth Aframe of the United States Attorney's Office District of New Hampshire in hand (at address 53 Pleasant St. Concord, New Hampshire, 03301) on this date of **8 July, 2016**.

A handwritten signature in black ink, appearing to read "Johnathon S. Irish", is written over the printed name.

Johnathon S. Irish

Pro-Se